

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**IN RE: REALPAGE, INC., RENTAL
SOFTWARE ANTITRUST LITIGATION
(NO. II)**

**Case No. 3:23-md-3071
MDL No. 3071**

Chief Judge Waverly D. Crenshaw, Jr.

**This document relates to:
3:23-cv-00757
3:23-cv-00792**

**STUDENT RENTER PLAINTIFFS' UNOPPOSED MOTION TO DEEM GREYSTAR
MANAGEMENT SERVICES, LLC SUBSTITUTED FOR GREYSTAR
MANAGEMENT SERVICES, LP**

Student Renter Plaintiffs in certain matters transferred to this multidistrict litigation (“MDL”) originally named “Greystar Management Services, LP” as a Defendant. Counsel for that entity conferred with Plaintiffs’ Co-Lead Counsel for the Multi-Family Plaintiffs and indicated that the correct Defendant was “Greystar Management Services, LP.” Accordingly, in recently transferred actions before this Court, Student Renter Plaintiffs named “Greystar Management Services LP” (M.D. Tenn. Case No. 3:23-cv-00757; M.D. Tenn. Case No. 3:23-cv-00792) as a Defendant. As of June 23, 2023, Greystar Management Services, LP was converted to Greystar Management Services, LLC. Student Renter Plaintiffs therefore respectfully move the Court to update the name on the MDL docket to “Greystar Management Services, LLC” to reflect this conversion.

The pleadings in the underlying dockets in the above-captioned matters list “Greystar Management Services, LP” rather than the correct entity. As to the above-captioned matters, Student Renter Plaintiffs therefore respectfully move the Court to (1) deem “Greystar Management Services, LLC” as substituted for “Greystar Management Services, LP” in each

underlying case; and (2) terminate “Greystar Management Services, LP” as a Defendant on each underlying case docket in which it appears. Student Renter Plaintiffs also submit that filing individual amended complaints in each of these actions would not be a good use of party or judicial resources. Accordingly, in the interests of conservation of resources and judicial economy, Student Renter Plaintiffs hereby respectfully request that the Court also defer the need for the Student Renter Plaintiffs in each of these underlying matters to file an amended pleading reflecting this substitution until further order of the Court.

Counsel for the Student Renter Plaintiffs has conferred with counsel for the Greystar entities. They have indicated that they do not oppose the relief requested in this Motion, provided that Student Renter Plaintiffs agree that consenting to this relief does not constitute a waiver of their right to challenge service of process, subject matter jurisdiction (as qualified by Defendants’ June 7, 2023 Notice Re Defendants’ Positions on Jurisdiction, Service, Arbitration and Other Issues) (Dkt. 261), personal jurisdiction, or venue, or on the basis of agreements to arbitrate, class action waivers, jury trial waiver, and venue-selection provisions, as warranted. Student Renter Plaintiffs have agreed to this request and ask the Court to grant the relief requested herein, subject to that understanding.

DATED: August 28, 2023.

Respectfully submitted,

HAGENS BERMAN SOBOL SHAPIRO LLP

/s/ Steve W. Berman

Steve W. Berman (*pro hac vice*)

Breanna Van Engelen (*pro hac vice*)

1301 Second Ave., Suite 2000

Seattle, WA 98101

Telephone: (206) 623-7292

Facsimile: (206) 623-0594

E-mail: steve@hbsslaw.com

breannav@hbsslaw.com

*Attorneys for Plaintiffs Mia Lauder, Rachel
Meredith, Benjamin Dempsey and Ivonne Arriola
Mendieta and Plaintiffs' Steering Committee
Counsel for Plaintiffs*

Tricia R. Herzfeld (#26014)
Anthony A. Orlandi (#33988)
**HERZFELD SUETHOLZ GASTEL LENISKI
AND WALL, PLLC**
223 Rosa L. Parks Avenue, Suite 300
Nashville, TN 37203
Telephone: (615) 800-6225
tricia@hsglawgroup.com
tony@hsglawgroup.com

Liaison Counsel

Patrick J. Coughlin
Carmen A. Medici
Fatima Brizuela
SCOTT+SCOTT ATTORNEYS AT LAW LLP
600 West Broadway, Suite 3300
San Diego, CA 92101
Telephone: (619) 798-5325
Facsimile: (619) 233-0508
pcoughlin@scott-scott.com
cmedici@scott-scott.com
fbrizuela@scott-scott.com

Patrick McGahan
Michael Srodoski
G. Dustin Foster
Amanda Lawrence
Isabella De Lisi
SCOTT+SCOTT ATTORNEYS AT LAW LLP
156 South Main Street
P.O. Box 192
Colchester, CT 06145
Telephone: (860) 537-5537
Facsimile: (860) 537-4432
pmcgahan@scott-scott.com
msrodoski@scott-scott.com
gfoster@scott-scott.com
alawrence@scott-scott.com
idelisi@scott-scott.com

Stacey Slaughter
Thomas J. Undlin
Geoffrey H. Kozen
Stephanie A. Chen
J. Austin Hurt
ROBINS KAPLAN LLP
800 LaSalle Avenue, Suite 2800
Minneapolis, MN 55402
Telephone: (612) 349-8500
Facsimile: (612) 339-4181
sslaughter@robinskaplan.com
tundlin@robinskaplan.com
gkozen@robinskaplan.com
schen@robinskaplan.com
ahurt@robinskaplan.com

Swathi Bojedla
Mandy Boltax
HAUSFELD LLP
888 16th Street, N.W., Suite 300
Washington, DC 20006
Telephone: (202) 540-7200
sbojedla@hausfeld.com
mboltax@hausfeld.com

Gary I. Smith, Jr.
HAUSFELD LLP
600 Montgomery Street, Suite 3200
San Francisco, CA 94111
Tel: (415) 633-1908
gsmith@hausfeld.com

Katie R. Beran
HAUSFELD LLP
325 Chestnut Street, Suite 900
Philadelphia, PA 19106
Telephone: 1 215 985 3270
kberan@hausfeld.com

Interim Co-Lead Counsel

Eric L. Cramer
Michaela L. Wallin
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Telephone: (215) 875-3000
ecramer@bm.net
mwallin@bm.net

Daniel J. Walker
BERGER MONTAGUE PC
2001 Pennsylvania Avenue, NW, Suite 300
Washington, DC 20006
Telephone: (202) 559-9745
dwalker@bm.net

Brendan P. Glackin
Dean M. Harvey
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
275 Battery Street, Suite 2900
San Francisco, CA 94111
Telephone: 415-956-1000
bglackin@lchb.com
dharvey@lchb.com

Mark P. Chalos
Hannah R. Lazarz
Kenneth S. Byrd
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
222 2nd Avenue South, Ste. 1640
Nashville, TN 37201
(615) 313-9000
mchalos@lchb.com
hlazarz@lchb.com
kbyrd@lchb.com

Benjamin J. Widlanski
Javier A. Lopez
KOZYAK TROPIN & THROCKMORTON LLP
2525 Ponce de Leon Blvd., 9th Floor
Coral Gables, Florida 33134
Telephone: (305) 372-1800
bwidlanski@kttlaw.com
jal@kttlaw.com

Christian P. Levis
Vincent Briganti
Peter Demato
Radhika Gupta
LOWEY DANNENBERG, P.C.
44 South Broadway, Suite 1100
White Plains, NY 10601
Telephone: (914) 997-0500
Facsimile: (914) 997-0035
vbriganti@lowey.com
clevis@lowey.com
pdemato@lowey.com
rgupta@lowey.com

Christopher M. Burke
Walter W. Noss
Yifan (Kate) Lv
KOREIN TILLERY P.C.
707 Broadway, Suite 1410
San Diego, CA 92101
Telephone: (619) 625-5621
Facsimile (314) 241-3525
cburke@koreintillery.com
wnoss@koreintillery.com
klv@koreintillery.com

Joseph R. Saveri
Steven N. Williams
Cadio Zirpoli
Kevin E. Rayhill
JOSEPH SAVERI LAW FIRM, LLP
601 California Street, Suite 1000
San Francisco, CA 94108
Telephone: (415) 500-6800
jsaveri@saverilawfirm.com
swilliams@saverilawfirm.com
czirpoli@saverilawfirm.com
krayhill@saverilawfirm.com

Jennifer W. Sprengel
Daniel O. Herrera
Alexander Sweatman
CAFFERTY CLOBES MERIWETHER & SPRENGEL LLP
135 S. LaSalle, Suite 3210
Chicago, IL 60603
Telephone: 312-782-4880
Facsimile: 312-782-4485
jsprengel@caffertyclobes.com
dherrera@caffertyclobes.com
asweatman@caffertyclobes.com

Plaintiffs' Steering Committee Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on August 28, 2023, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

/s/ Steve W. Berman

Steve W. Berman